

# PRIVACY NOTICE

In this Notice, Garity Advantage (the “Company”) discloses information about its personal data processing practices. This Notice is effective October 19, 2020. The Company respects your privacy and is committed to protecting it through our compliance with these policies.

Each of the Company’s subsidiaries has posted a privacy notice that is specific to its personal data processing practices, which may differ from the Company’s data processing practices.

As described in more detail in this Notice, the main purpose of the Company’s collection and use of personal information is to communicate with licensed insurance agents and insurance marketing organizations and facilitate the sale of insurance products to individuals who express interest in such products.

## PERSONAL INFORMATION WE COLLECT

The Company collects or obtains the following types of “personal information,” defined as information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device:

CATEGORY	EXAMPLES
Identifiers	Customers’, Consumers’ and Agents’ name. Customers’, Consumers’ and Agents’ postal and email address. Agents’ license number, and National Producer Number. Customers’, Agents’, and Employees’ name, address, email address, and Social Security number.
Personal information categories listed in the California Customer Records statute	Customers’ insurance policy number. Agents’ financial information (paid commissions).
Characteristics of protected classifications under California or federal law	Customers’, Consumers’ and Agents’ age. Employees’ age, race, marital status, and sex or gender.
Commercial information	Customers’ products or services purchased.

Internet or other similar network activity	Information on a user's interaction with our websites, applications, or advertisements.
Geolocation data	Location of website users.
Professional or employment-related information	Employees' and contractors' job history submitted to us.
Education information	Employees' and contractors' education information submitted to us.

The Company does not collect biometric information or sensory data.

**SOURCES OF PERSONAL INFORMATION**

The Company collects the categories of personal information above from the following categories of sources:

- Directly from users when they provide information electronically, by phone, or by mail;
- Our affiliates and business partners;
- Our agents;
- Lead vendors to whom you have provided your information;
- Client referrals;
- Data verification services;
- Users' browsers;
- Marketing vendors and advertising networks; and
- Social media, if you provide us information on social media platforms.

The Company obtains information pertaining to insurance agents primarily from the agents themselves when they choose to affiliate with the Company. The Company obtains information pertaining to consumers seeking to purchase insurance products from referrals and written and electronic consumer inquiries regarding insurance products (including through companies that assist in the delivery of such inquiries). The Company also obtains such information from its subsidiaries.

**USE OF PERSONAL INFORMATION**

The Company may use or disclose the personal information that it collects for one or more of the following purposes:

- Provide you products and services;
- Address your inquiries;
- Process transactions;
- Tailor the content and information that we may send or display to you;

- Where permitted, for marketing and promotional purposes, such as to provide information to you about the products and services we offer;
- Analyze use of our products and services, where permitted by law;
- Develop new products and services;
- Provide and personalize our services;
- Comply with legal obligations;
- Protect our rights, property, and safety or the rights, property, and safety of others;
- As described to you when collecting your personal information or as otherwise set forth in applicable law;
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our customers is among the assets transferred.

The Company uses information pertaining to insurance agents to communicate with and compensate insurance agents. The Company uses information pertaining to consumers seeking to purchase insurance products to contact such consumers and provide policy services.

From time to time, the Company may contact you via email, mail, and/or telemarketing calls, for the purpose of providing announcements, promotional offers, alerts, confirmations, surveys, and/or other general communication. If you would like to stop receiving marketing or promotional communications via email, mail, and/or telemarketing calls from the Company, you may opt out of such communications by contacting us at the toll-free number or email address listed below.

## SHARING PERSONAL INFORMATION

The Company may disclose your personal information to a third party for a business purpose. The Company may share the personal information of consumers with licensed insurance agents, insurance carriers, service providers, all primarily for the purpose of facilitating the sale of insurance products to individuals who are interested in purchasing insurance products.

In the preceding 12 months, the Company may have disclosed the following categories of personal information for a business purpose: identifiers, California Customer Records personal information categories, protected classification characteristics under California or federal law, commercial information, and internet or other similar network activity.

## COOKIE POLICY

Our website may use “cookies” to enhance user experience. User’s web browser places cookies on their hard drive for record-keeping purposes and sometimes to track information about them. Cookies can also enable us to track and target the interests of our users to enhance their experience on our website. We may use the following types of cookies: advertising and analytics and social media. Usage of a cookie is not linked to any personally identifiable information on our website.

User may choose to set their web browser to refuse cookies or to alert you when cookies are being sent. If they do so, note that some parts of the website may not function properly.

## CHILDREN UNDER THE AGE OF 16

Our website is not intended for children under 16 years of age. No one under age 16 may provide any information on the website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this website. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us.

## Exercising Your Rights

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative; and
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

To exercise the access, opt-out, and/or deletion rights described herein, you may call the toll free number below or visit our website:

- Toll Free Number: Please submit a verifiable consumer request to us by calling us at 1-888-914-9661 and use PIN 378314; please leave a detailed message including:

§ your name

§ your address

§ our company name

· Website: To exercise any of these rights, you may submit a request to us by visiting the following webpage [Garity Advantage Privacy Portal](#)

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### **NON-DISCRIMINATION UNDER CCPA**

We will not discriminate against you for exercising any of your CCPA rights. If you make a CCPA request, we will not, as a direct result:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **OTHER CALIFORNIA PRIVACY RIGHTS**

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes.

To make such a request, please contact us using the contact methods below.

## CONTACT INFORMATION

If you have any questions or comments about this notice, or the ways in which the Company collects and use your personal information, please do not hesitate to contact us at:

Phone: 1-800-234-9488

Email: [compliance@garityadvantage.com](mailto:compliance@garityadvantage.com)